

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	
)	CASE NO. 21-50289-PWB
BRIDGET SURGRETТА TAYLOR,)	
)	CHAPTER 7
<u>Debtor.</u>)	

MOTION TO WITHDRAW AS COUNSEL

COMES NOW Berry and Associates, counsel-of-record for the Debtor in the above-styled Chapter 7 case, and files this "Motion to Withdraw as Counsel" ("Motion"), showing to this Court the following:

1.

This Court has jurisdiction in this matter pursuant to 28 U.S.C. Section 1334, 28 U.S.C. Section 151, and 28 U.S.C. Section 157.

2.

This Court is the proper venue for this matter pursuant to 28 USC Section 1409.

3.

This matter is a core proceeding within the contemplation of 28 U.S.C. Section 157.

4.

Debtor filed a voluntary petition for relief under Chapter 13 of Title 11 of the United States Code January 13, 2021 and is eligible for relief under 11 U.S.C. §109. Debtor, pro se, converted the case to a Chapter 7 proceeding on or about March 9, 2021.

5.

Debtor has notified counsel that she wishes to terminate Berry and Associates as counsel as of March 2, 2021, and has consented to this Withdrawal. Since Debtor has made it clear that she no longer wants representation from Berry and Associates she waives any waiting period and intends to represent herself pro se going forward.

6.

Debtor has been informed of counsel's intention to withdraw via phone call, email and a letter dated and mailed March 11, 2021. A copy of the letter is attached hereto.

WHEREFORE, Debtor prays:

- (a) That this Motion be filed, read, and considered;
- (b) That this Honorable Court grant this Motion; and,
- (c) That this Honorable Court grant such further relief as it may deem just and proper.

Respectfully submitted,

/s/

Carrie Oxendine
GA Bar No. 141478
Attorney for Debtor
BERRY AND ASSOCIATES
2751 Buford Hwy, Suite 600
Atlanta, GA 30324
(404) 235-3300
carrie@mattberry.com



Phone (404) 235-3300
Toll-free (800) 720-8620
Fax (404) 235-3333

March 11, 2021

Bridget Surgretta Taylor
3947 Veracruz Court
Decatur, Georgia 30034

RE: Your Bankruptcy Case 21-50289

Dear Ms. Taylor,

Because you have terminated Berry and Associates, consenting to our withdrawal from your case, I will file a "Motion to Withdraw as Counsel" in your case.

Our withdrawal as your counsel will not affect the course or proceedings of your case. The United States Bankruptcy Court for the Northern District of Georgia will retain jurisdiction over your now converted Chapter 7 case. You will be responsible for going forward in your case and to prepare for, attend and participate in any hearing, trial, conference and discovery proceeding, that is scheduled. The clerk's office is located at 75 Ted Turner Drive, SW, Atlanta, GA 30303 room 1340. The phone number is 404-215-1000.

You will receive notice of our Motion to Withdraw as Counsel once that is filed. You may file any objection that you have to that motion with the clerk's office pursuant to the instructions in that motion.

There is a 341 Meeting of Creditor's scheduled on April 13, 2021 at 2:40 P.M. This meeting will be Telephonic. To attend, Dial: 866-909-7148 and enter: 4958999, when prompted for participation code. Also, the due date for your second financial management course to be filed with the Court is scheduled for May 28, 2021. Failure to file the certificate may result in the Court denying your case a discharge.

Once the Court enters its order allowing us to withdraw, you should notify the Clerk of the Court of whether you intend to proceed pro se (without counsel) or whether you have obtained new counsel. New counsel should file its appearance with the Court as soon as possible. You also must notify the Clerk of the Court of your correct mailing address, being sure to keep them up-to-date with that information. Pleadings and correspondence will be served directly on you until new counsel enters an appearance. Failure to follow-through on any of these responsibilities could have adverse effects on your case, including the dismissal of your Chapter 7 case.

If you have any questions, do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carrie Oxendine', written over a horizontal line.

Carrie Oxendine
Attorney at Law

Served via email, regular mail, & certified mail: 9171 9690 0935 0261 4909 68



2751 Buford Highway NE
Suite 600
Atlanta, Georgia 30324



9171 9690 0935 0261 4909 68

NEOPOST
03/11/2021
US POSTAGE \$004.11⁰

ZIP 30324
041M11458954

Bridget Surgretta Taylor
3947 Veracruz Court
Decatur, GA 30034



2751 Buford Highway NE
Suite 600
Atlanta, Georgia 30324

NEOPOST
03/11/2021
US POSTAGE \$000.51⁰

ZIP 30324
041M11458954

Bridget Surgretta Taylor
3947 Veracruz Court
Decatur, GA 30034

CERTIFICATE OF SERVICE

This is to certify under penalty of perjury that I am over the age of 18 and that on this day I served the following parties with a copy of the attached pleadings by placing true copies of same in the United States Mail with adequate postage affixed to ensure delivery, addressed to:

S. Gregory Hays
Chapter 7 Trustee
Hays Financial Consulting, LLC
Suite 555
2964 Peachtree Road
Atlanta, GA 30305

Bridget S. Taylor
3947 Veracruz Court
Decatur GA 30034

(Plus to all Creditors on the attached Creditor Mailing Matrix)

This the 11th day of March, 2021.

/s/
Carrie Oxendine
Attorney for the Debtor

BERRY & ASSOCIATES
2751 Buford Highway, Suite 600
Atlanta, GA 30324
(404) 235-3300

Label Matrix for local noticing
113E-1
Case 21-50289-pwb
Northern District of Georgia
Atlanta
Thu Mar 11 16:32:37 EST 2021

Amex
Correspondence/Bankruptcy
PO Box 981540
El Paso, TX 79998-1540

Matthew Thomas Berry
Matthew T. Berry & Associates
Suite 600
2751 Buford Highway, NE
Atlanta, GA 30324-5457

S. Gregory Hays
Hays Financial Consulting, LLC
Suite 555
2964 Peachtree Road
Atlanta, GA 30305-4909

Lakeland
11201 North Tatum Blvd Suite 300
PMB 9612
Phoenix, AZ 85028-6039

(p)LENDMARK FINANCIAL SERVICES
2118 USHER ST
COVINGTON GA 30014-2434

MidFirst Bank
999 N.W Grand Blvd
Oklahoma City, OK 73118-6051

NetCredit
175 West Jackson Boulevard
Suite 1000
Chicago, IL 60604-2863

Orion Portfolio Services II, LLC
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk VA 23541-1021

RISE Credit
Attn: Bankruptcy
PO Box 101808
Fort Worth, TX 76185-1808

AmShel Collection Services
4524 Southlake Parkway
Suite 15
Birmingham, AL 35244-3271

Atlanta Postal Credit Union
c/o Albert F. Nasuti
Thompson, O'Brien, Kemp & Nasuti, P.C.
40 Technology Parkway South
Suite 300
Peachtree Corners, GA 30092-2924

(p)JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

Helix
11201 North Tatum Blvd Suite 300
PMB 9612
Phoenix, AZ 85028-6039

Lendio
11201 North Tatum Blvd Suite 300
PMB 9612
Phoenix, AZ 85028-6039

Loan Depot
PO Box 660275
Dallas, TX 75266-0275

Midland Mortgage Co
Attn: Customer Service/Bankruptcy
PO Box 26648
Oklahoma City, OK 73126-0648

Office of the United States Trustee
362 Richard Russell Building
75 Ted Turner Drive, SW
Atlanta, GA 30303-3315

Carrie L Oxendine
Matthew T. Berry & Associates
Suite 600
2751 Buford Highway NE
Atlanta, GA 30324-5457

Laura D. Suggs
Campbell & Brannon, LLC
5565 Glenridge Connector
Suite 350
Atlanta, GA 30342-4705

American Express National Bank, AENB
c/o Zwicker and Associates, P.C.
Attorneys/Agents for Creditor
P.O. Box 9043
Andover, MA 01810-0943

Atlanta Postal Credit Union
Attn: Bankruptcy
3900 Crown Rd
Atlanta, GA 30380-0001

Angela D. Forte
POB 477
Redan, GA 30074-0477

JPMorgan Chase Bank, N.A.
s/b/m/t Chase Bank USA, N.A.
c/o National Bankruptcy Services, LLC
P.O. Box 9013
Addison, Texas 75001-9013

Lendmark Financial Services
Attn: Bankruptcy
1735 North Brown Rd, Ste 300
Lawrenceville, GA 30043-8228

Makwa
11201 North Tatum Blvd Suite 300
PMB 9612
Phoenix, AZ 85028-6039

Albert F. Nasuti
Thompson, O'Brien, Kemp & Nasuti, PC
Suite 300
40 Technology Parkway South
Peachtree Corners, GA 30092-2924

Orion
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Bridget Surgretta Taylor
3947 Veracruz Court
Decatur, GA 30034-5109

United States Attorney
Northern District of Georgia
75 Ted Turner Drive SW, Suite 600
Atlanta GA 30303-3309

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Chase Card Services
Attn: Bankruptcy
PO Box 15298
Wilmington, DE 19850

Lendmark Financial Services, LLC
2118 Usher Street
Covington, GA 30014

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)MidFirst Bank
999 N.W. Grand Blvd
Oklahoma City, OK 73118-6051

End of Label Matrix	
Mailable recipients	30
Bypassed recipients	1
Total	31